

EXHIBIT 9

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES ALEX
FIELDS, JR., VANGUARD AMERICA,
ANDREW ANGLIN, MOONBASE
HOLDINGS, LLC, ROBERT "AZZMADOR"
RAY, NATHAN DAMIGO, ELLIOTT
KLINE a/k/a ELI MOSELEY, IDENTITY
EVROPA, MATTHEW HEIMBACH, MATTHEW
PARROTT a/k/a DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-KNIGHTS,
MICHAEL "ENOCH" PEINOVICH, LOYAL
WHITE KNIGHTS OF THE KU KLUX KLAN,
and EAST COAST KNIGHTS OF THE KU KLUX
KLAN a/k/a EAST COAST KNIGHTS OF THE
TRUE INVISIBLE EMPIRE,

Defendants.

DEFENDANT'S FIELDS' RESPONSE TO PLAINTIFFS' FIRST SET OF
REQUEST FOR ADMISSIONS

COMES NOW Defendant JAMES ALEX FIELDS, JR. ("Fields"), by counsel, and for his

Responses to Plaintiffs' First Set of Requests for Admission, states as follows:

1. Admit that, on August 11, 2017, you departed Ohio to travel to Virginia, Driving a Dodge Challenger.

RESPONSE: Admitted.

2. Admit that you arrived in Charlottesville, Virginia in the early morning of August 12, 2017.

RESPONSE: Admitted.

3. Admit that, on August 12, 2017, you attended the United the Right rally in Charlottesville, Virginia.

RESPONSE: Admitted.

4. Admit that, on the morning of August 12, 2017, you arrived in and around the immediate vicinity of Emancipation Park in Charlottesville, Virginia.

RESPONSE: Admitted.

5. Admit that, at the Unite the Right rally on August 12, 2017, you engaged in chants promoting or expressing white-supremacist and other racist and anti-Semitic views.

RESPONSE: Admitted.

6. Admit that, during the Unite the Right rally in Charlottesville, Virginia on August 12, 2017, you held a shield that displaced a symbol of Vanguard America.

RESPONSE: Admitted.

7. Admit that, during the Unite the Right rally in Charlottesville, Virginia on August 12, 2017, you wore a white polo shirt.

RESPONSE: Admitted.

8. Admit that, during the United the Right rally in Charlottesville, Virginia on August 12, 2017,

you wore khaki pants.

RESPONSE: Admitted.

9. Admit that, prior to August 12, 2027, you knew the uniform of Vanguard America was a white polo shirt and khaki pants.

RESPONSE: Admitted.

10. Admit that, during the Unite the Right rally in Charlottesville, Virginia on August 12, 2017, you knew the uniform of Vanguard America was white polo shirt and khaki pants.

RESPONSE: Admitted.

11. Admit that, during the Unite the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with members of Vanguard America.

RESPONSE: Admitted that Fields participated in the rally and members of Vanguard America also participated in the rally.

12. Admit that, during the Unite the Right rally in Charlottesville, Virginia, on August 12, 2017, you participated in the rally with members of Identity Evropa.

RESPONSE: Admitted that Fields participated in the rally and members of Identity Evropa also participated in the rally.

13. Admit that, during the Unite the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with members of the Nationalist Front.

RESPONSE: Admitted that Fields participated in the rally and members of Nationalist Front also participated in the rally.

14. Admit that, during the Unite the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with members of the Traditionalist Workers Party.

RESPONSE: Admitted that Fields participated in the rally and members of the Traditionalist Workers Party also participated in the rally

15. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with members of the League of the South.

RESPONSE: Admitted that Fields participated in the rally and members of League of the South also participated in the rally.

16. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with members of the Fraternal Order of the Alt-Knights.

RESPONSE: Admitted that Fields participated in the rally and members of Fraternal Order of the Alt-Knights may have participated in the rally.

17. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with members of the Loyal White Knights of the Ku Klux Klan.

RESPONSE: Admitted that Fields participated in the rally and members of the Loyal White Knights of the Ku Klux Klan also participated in the rally.

18. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with members of the East Coast Knights of the Ku Klux Klan a/k/a East Coast Knights of the True Invisible Empire.

RESPONSE: Admitted that Fields participated in the rally and members of the East Coast Knights of the Ku Klux Klan a/k/a East Coast Knights of the True Invisible Empire also participated in the rally.

19. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Jason Kessler.

RESPONSE: Admitted that Fields participated in the rally and Jason Kessler also participated in the rally.

20. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Richard Spencer.

RESPONSE: Admitted that Fields participated in the rally and Richard Spencer also participated in the rally.

21. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Christopher Cantwell.

RESPONSE: Admitted that Fields participated in the rally and Christopher Cantwell also participated in the rally.

22. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Andrew Anglin.

RESPONSE: Admitted that Fields participated in the rally and Andrew Anglin also participated in the rally.

23. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Robert “Azzmador” Ray.

RESPONSE. Admitted that Fields participated in the rally and Robert “Azzmador” Ray also participated in the rally.

24. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Nathan Damigo.

RESPONSE: Admitted that Fields participated in the rally and Nathan Damigo also participated in the rally.

25. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Elliot Kline a/k/a Eli Mosely.

RESPONSE: Admitted that Fields participated in the rally and Elliot Kline a/k/a Eli Mosely also participated in the rally

26. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Matthew Heimbach.

RESPONSE: Admitted that Fields participated in the rally and Matthew Heimbach also participated in the rally

27. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Matthew Parrott a/k/a David Matthew Parrott.

RESPONSE: Admitted that Fields participated in the rally and Matthew Parrott a/k/a David Matthew Parrott also participated in the rally.

28. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Michael Hill.

RESPONSE: Admitted that Fields participated in the rally and Michael Hill also participated in the rally.

29. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Michael Tubbs.

RESPONSE: Admitted that Fields participated in the rally and Michael Tubbs also participated in the rally.

30. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Jeff Schoep.

RESPONSE: Admitted that Fields participated in the rally and Jeff Schoep also participated in the rally.

31. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Augustus Sol Invictus.

RESPONSE: Admitted that Fields participated in the rally and upon information and belief Augustus Sol Invictus also participated in the rally.

32. Admit that, during the Unity the Right rally in Charlottesville, Virginia on August 12, 2017, you participated in the rally with Michael "Enock" Peinovich.

RESPONSE: Admitted that Fields participated in the rally and Michael Peinovich may have participated in the rally

33. Admit that, as of August 12, 2017, you owned a 2010 Dodge Challenger with Ohio license plate GVF 1111.

RESPONSE: Admitted.

34. Admit that, on August 12, 2017, the windows of your Dodge Challenger were tinted.

RESPONSE: Admitted.

35. Admit that, on August 12, 2017, you were the only person to drive your Dodge Challenger.

RESPONSE: Admitted.

36. Admit that, on August 12, 2017, you were the only person to drive your Dodge Challenger prior to your arrest.

RESPONSE: Admitted.

37. Admit that, on August 12, 2017, you drove your Dodge Challenger onto Fourth Street in Charlottesville, Virginia.

RESPONSE: Admitted.

38. Admit that, on August 12, 2017, you slowly proceeded in your Dodge Challenger down Fourth Street toward a crowd of pedestrians located at the intersection of Fourth Street and East Water Street, and observed the crowd while idling in your vehicle.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

39. Admit that, on August 12, 2017, after observing the crowd of pedestrians at the Fourth Street and East Water Street, you slowly reversed your Dodge Challenger back up Fourth Street toward the top of the hill, near the intersection of Fourth Street and East Market Street.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

40. Admit that, on August 12, 2017, you rapidly accelerated your Dodge Challenger down Fourth Street towards the intersection of Fourth Street and East Water Street, running through a stop sign and across a raised pedestrian mall, and drove directly into a crowd of pedestrians.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

41. Admit that, on August 12, 2017, after you hit a crowd of pedestrians with your Dodge Challenger, you struck a stopped vehicle near the intersection of Fourth Street and East Water Street.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

42. Admit that, on August 12, 2017, after striking another vehicle with your Dodge Challenger, you rapidly reversed your car and fled the scene.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

43. Admit that, on August 12, 2017, you drove into a crowd of pedestrians because of the actual or perceived race, color, religion, and/or national original of individuals in the crown.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

44. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards a group of pedestrians in Charlottesville, Virginia.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

45. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Elizabeth Sines.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

46. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Marissa Blair.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

47. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards April Muniz.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

48. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Marcus Martin.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

49. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Natalie Romero.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

50. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Chelsea Alvarado.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

51. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger towards Thomas Baker.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

52. Admit that, on August 12, 2017, you intentionally drove your Dodge Challenger into a group of pedestrians in Charlottesville, Virginia.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

53. Admit that, on August 12, 2017, you struck a group of pedestrians with your Dodge Challenger.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

54. Admit that, on August 12, 2017, you struck Elizabeth Sines with your Dodge Challenger.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

55. Admit that, on August 12, 2017, you struck Marissa Blair with your Dodge Challenger.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

56. Admit that, on August 12, 2017, you struck April Muniz with your Dodge Challenger.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

57. Admit that, on August 12, 2017, you struck Marcus Martin with your Dodge Challenger.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

58. Admit that, on August 12, 2017, you struck Natalie Romero with your Dodge Challenger.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

59. Admit that, on August 12, 2017, you struck Chelsea Alvarado with your Dodge Challenger.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

60. Admit that, on August 12, 2017, you struck Thomas Baker with your Dodge Challenger.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution

against self-incrimination.

61. Admit that, on August 12, 2017, you caused injury to pedestrians in Charlottesville, Virginia.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

62. Admit that, on August 12, 2017, you caused injury to Elizabeth Sines.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

63. Admit that, on August 12, 2017, you caused injury to Marissa Blair.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

64. Admit that, on August 12, 2017, you caused injury to April Muniz.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

65. Admit that, on August 12, 2017, you caused injury to Marcus Martin.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

66. Admit that, on August 12, 2017, you caused injury to Natalie Romero.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

67. Admit that, on August 12, 2017, you caused injury to Chelsea Alvarado.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

68. Admit that, on August 12, 2017, you caused injury to Thomas Baker.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

69. Admit that, on August 12, 2017, you were not in reasonable apprehension of death or great bodily harm.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

70. Admit that, on August 12, 2017, you did not retreat from a threat of death or great bodily harm and announce your desire for peace.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

71. Admit that you striking a crowd of pedestrians with your Dodge Challenger was not a reasonably apparent necessity to preserve your life or save yourself from great bodily harm.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

72. Admit that you were arrested on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Admitted.

73. Admit that you pled guilty to twenty-nine (29) counts of violating 18 U.S.C. § 249(a)(1).

RESPONSE: Admitted.

74. Admit that you pled guilty to twenty-nine (29) counts of violating 18 U.S.C. § 249(a)(1) because you are, in fact, guilty of what was charged in those counts.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution

against self-incrimination.

75. Admit that you have expressed and promoted your view that white people are superior to other races and peoples.

RESPONSE: Admitted.

76. Admit that you have expressed support of the social and racial policies of Adolf Hitler and Nazi-era Germany, including the Holocaust.

RESPONSE: Admitted.

77. Admit that you have espoused violence against African Americans.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

78. Admit that you have espoused violence against Jewish people.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

79. Admit that you have espoused violence against members of racial, ethnic, and religious groups that you perceived to be non-white.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

80. Admit that you have used the term “kike.”

RESPONSE: Admitted.

81. Admit that you have used the term “kike” to refer to Jewish people.

RESPONSE: Admitted.

82. Admit that you have used the term “filthy kike.”

RESPONSE: Admitted.

83. Admit that you have used the term “filthy kike” to refer to Jewish people.

RESPONSE: Admitted.

84. Admit that you have used the term “nigger.”

RESPONSE: Admitted.

85. Admit that you have used the term “nigger” to refer to black people.

RESPONSE: Admitted.

86. Admit that you have used the term “spic.”

RESPONSE: Admitted.

87. Admit that you have used the term “spic” to refer to Hispanic people.

RESPONSE: Admitted.

88. Admit that you have used the term “race traitors.”

RESPONSE: Admitted.

89. Admit that you have used the term “race traitors” to refer to white people who do not hold your views regarding race.

RESPONSE: Admitted.

90. Admit that you have used the term “race traitors” to refer to counter-protesters at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Admitted.

91. Admit that you have used the term “anti-white liberal.”

RESPONSE: Admitted.

92. Admit that you have used the term “anti-white liberal” to refer to individuals who do not hold

your views regarding race.

RESPONSE: Admitted.

93. Admit that you have used the term “anti-white liberal” to refer to counter-protesters at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Admitted.

94. Admit that you have used the term “communists” to refer to counter-protesters at the Unite the Right rally that took placed on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Admitted.

95. Admit that you sent a communication on Twitter stating: “There’s enough difference between Europeans and Africans to be a different sub-species.”

RESPONSE: Admitted.

96. Admit that you sent a communication on Twitter stating: “Human beings in general are animals. Europeans are superior sub species. You should take a course on evolution sometime, nigger.”

RESPONSE: Admitted.

97. Admit that you sent a communication on Twitter stating: “Black, negro, someone of mostly African descent. They aren’t European. Filthy Degenerate.”

RESPONSE: Admitted.

98. Admit that you sent a communication on Twitter stating: “Blacks make up only 12 percent of the population yet commit over 50 percent of violent crimes. The average black has an IQ of 65 to 75, the range of a retard.”

RESPONSE: Admitted.

99. Admit that you sent a communication on Twitter stating: “The White Race build modern civilization. Looking at all we’ve accomplished, no other Race can even compete. #HitlerWasRight.”

RESPONSE: Admitted.

100. Admit that you sent a communication on Twitter stating: “I wonder if the masses will ever wake up. I have a hard time not hating them for their ignorance. #HitlerWasRight.”

RESPONSE: Admitted.

101. Admit that you sent a communication on Twitter stating: “We as people need to reclaim Leadership of our Nation, and cast off the shackles of the Jew.”

RESPONSE: Admitted.

102. Admit that you sent a communication on Instagram stating: “No, you get out. You filthy nigger.”

RESPONSE: Admitted.

103. Admit that you sent a communication on Instagram stating: “Soon you filthy apes will be sent back to the jungle.”

RESPONSE: Admitted.

104. Admit that you sent a communication on Instagram stating: You filthy nigger. Know your place, you simple can’t compete with the White Man.”

RESPONSE: Admitted.

105. Admit that you sent a communication on Instagram stating: “Silence nigger, know your place.”

RESPONSE: Admitted.

106. Admit that you sent a communication on Instagram stating: “Heil Hitler. We must secure the

existence of our people, & a future for White Children.”

RESPONSE: Admitted.

107. Admit that you sent a communication on Facebook stating: “multi-culturalism destroys all cultures.”

RESPONSE: Admitted.

108. Admit that you sent a communication on Facebook stating: “the middle east is full of savages that need oppression.”

RESPONSE: Admitted.

109. Admit that you sent a communication on Facebook stating: “non-Europeans are just mooching off our people success.”

RESPONSE: Admitted.

110. Admit that you sent a communication on Facebook stating: “White Genocide is all too real.”

RESPONSE: Admitted.

111. Admit that you sent a communication on Facebook stating: “The U.S. at is core is European, and it needs to remain such.”

RESPONSE: Admitted.

112. Admit that you sent a communication on Facebook stating: “I hate liberals.:

RESPONSE: Admitted.

113. Admit that you sent a communication on Facebook stating: “It will rise again, the National Front will win.”

RESPONSE: Admitted.

114. Admit that you sent a communication on Facebook stating: “Fascism will solve the majority

of the problems the world is currently facing.”

RESPONSE: Admitted.

115. Admit that you sent a communication on Facebook stating: “You’re probably a filthy kike.”

RESPONSE: Admitted.

116. Admit that, as of August 12, 2017, you held a specific, class-based, invidiously discriminatory animus towards individuals who are non-white.

RESPONSE: Denied.

117. Admit that, as of August 12, 2017, you held a specific, class-based, invidiously discriminatory animus towards individuals who are Jewish.

RESPONSE: Denied.

118. Admit that, as of August 12, 2017, you held a specific, class-based, invidiously discriminatory animus towards individuals who are politically liberal.

RESPONSE: Denied.

119. Admit that, as of August 12, 2017, you held a specific, class-based, invidiously discriminatory animus towards individuals who are communists.

RESPONSE: Denied.

120. Admit that, as of August 12, 2017, you held animosity towards non-white individuals.

RESPONSE: Denied.

121. Admit that, as of August 12, 2017, you held animosity towards Jewish individuals.

RESPONSE: Denied.

122. Admit that when you hit pedestrians with your Dodge Challenger on August 12, 2017, you were motivated by animosity towards non-white individuals.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

123: Admit that when you hit pedestrians with your Dodge Challenger on August 12, 2017, you were motivated by animosity towards Jewish individuals.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

124. Admit that, as of or prior to August 12, 2017, you were a member of Vanguard America.

RESPONSE: Denied.

125. Admit that, as of or prior to August 12, 2017, you were a member of Identity Evropa.

RESPONSE: Denied.

126. Admit that, as of or prior to August 12, 2017, you were a member of the Nationalist Front.

RESPONSE: Denied.

127. Admit that, as of or prior to August 12, 2017, you were a member of Traditionalist Workers Party.

RESPONSE: Denied.

128. Admit that, as of or prior to August 12, 2017, you were a member of League of the South.

RESPONSE: Denied.

129. Admit that, as of or prior to August 12, 2017, you were a member of Fraternal Order of the Alt-Knights.

RESPONSE: Denied.

130. Admit that, as of or prior to August 12, 2017, you were a member of the Loyal White Knights of the Ku Klux Klan.

RESPONSE: Denied.

131. Admit that, as of or prior to August 12, 2017, you were a member of the East Coast Knights of the Ku Klux Kan a/k/a East Coast Knights of the True Invisible Empire.

RESPONSE: Denied.

132. Admit that you were aware that violence was planned against counter-protesters at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia

RESPONSE: Denied.

133. Admit that you planned to commit violence at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Denied.

134. Admit that you agreed with Vanguard America to commit violence at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Denied.

135. Admit that you agreed with the other defendants in this lawsuit to commit violence at the Unite the Right Rally that took place on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Denied.

136. Admit that you committed violence at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

137. Admit that you could have prevented yourself from committing violence at the Unite the Right rally that took place on August 12, 2017 in Charlottesville, Virginia.

RESPONSE: Fields asserts and relies upon his 5th Amendment Right of the US Constitution against self-incrimination.

138. Admit that, prior to August 13, 2017, you viewed posts on the Discord server named “Charlottesville 2.0.”

RESPONSE: Denied.

139. Admit that, prior to August 13, 2017, you posted on the Discord server named “Charlottesville 2.0.”

RESPONSE: Denied.

140. Admit that, prior to the Unite the Right rally that took place on August 12, 2017, you “liked” Twitter posts about the Unite the Right rally.

RESPONSE: Admitted.

141. Admit that, prior to the Unite the Right rally that took place on August 12, 2017, you “retweeted” Twitter posts about the Unite the Right rally.

RESPONSE: Admitted.

142. Admit that, prior to the Unite the Right rally that took place on August 12, 2017, you communicated on Twitter about the Unite the Right rally.

RESPONSE: Admitted.

143. Admit that, prior to the Unite the Right rally that took place on August 12, 2017, you communicated on Facebook about the Unite the Right rally.

RESPONSE: Defendant does not recall communicating on Facebook about Unite the Right but admits he may have.

144. Admit that, prior to the Unite the Right rally that took place on August 12, 2017, you

communicated on Instagram about the Unite the Right rally.

RESPONSE: Admitted.

145. Admit that, prior to the Unite the Right rally that took place on August 12, 2017, you communicated on Discord about the Unite the Right rally.

RESPONSE: Denied.

146. Admit that you communicated with Richard Spencer about the Unite the Right rally that took place on August 12, 2017.

RESPONSE: Denied.

147. Admit that you communicated with members of Vanguard America at the Unite the Right rally that took place on August 12, 2017.

RESPONSE: Admitted.

148. Admit that, prior to the Unite the Right rally that took place on August 12, 2017, you communicated with members of Vanguard America.

RESPONSE: Denied.

149. Admit that, prior to the Unite the Right rally that took place on August 12, 2017, you communicated with at least one defendant about the rally.

RESPONSE: Defendant admits that he posted a direct message to Richard Spencer and David Duke. Neither was returned. Therefore, Defendant admits he attempted to communicate with Mr. Spencer and Mr. Duke but was unsuccessful.

150. Admit that you received Christmas cards from Vanguard America.

RESPONSE: Admitted that Fields received Christmas cards from Vanguard America in prison.

151. Admit that, after you became aware of this lawsuit, you destroyed Christmas cards you

received from Vanguard America without producing them to Plaintiffs.

RESPONSE: Admitted.

152. Admit that the document with Bates Number MUNIZ00003855 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

153. Admit that the document with Bates Number City_00000188 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

154. Admit that the document with Bates Number City_00000224 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

155. Admit that the document with Bates Number City_00000227 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

156. Admit that the document with Bates Number City_00010946 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on September 30, 2017.

RESPONSE: Admitted.

157. Admit that the document with Bates Number City_00010969 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on October 6, 2017.

RESPONSE: Admitted.

158. Admit that the document with Bates Number City_00010972 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on October 7, 2017.

RESPONSE: Admitted.

159. Admit that the document with Bates Number City_00011060 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on November 21, 2017.

RESPONSE: Admitted.

160. Admit that the document with Bates Number City_00011061 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on November 22, 2017.

RESPONSE: Admitted.

161. Admit that the document with Bates Number City_00011068 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on November 26, 2017.

RESPONSE: Admitted.

162. Admit that the document with Bates Number City_00011115 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on December 13, 2017.

RESPONSE: Admitted.

163. Admit that the document with Bates Number City_00011171 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on December 15, 2017.

RESPONSE: Admitted.

164. Admit that the document with Bates Number City_00011175 is a true and accurate audio-recording of a voicemail to you from Jason Kessler on December 16, 2017.

RESPONSE: Admitted.

165. Admit that the document with Bates Number City_00011183 is a true and accurate audio-recording of a voicemail to you from Jason Kessler on December 18, 2017.

RESPONSE: Admitted.

166. Admit that the document with Bates Number City_00011261 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on February 6, 2019.

RESPONSE: Admitted.

167. Admit that the document with Bates Number City_00011387 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on March 23, 2019.

RESPONSE: Admitted.

168. Admit that the document with Bates Number City_00011477 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on July 13, 2019.

RESPONSE: Admitted.

169. Admit that the document with Bates Number City_00011544 is a true and accurate audio-recording of a telephone call between you and Jason Kessler on January 12, 2018.

RESPONSE: Admitted.

170. Admit that the document with Bates Number City_00011557 is a true and accurate audio-recording of a voicemail to you from Jason Kessler on July 17, 2018.

RESPONSE: Admitted.

171. Admit that the document with Bates Number City_00011669 is a true and accurate audio-recording of a voicemail to you from Jason Kessler on March 3, 2018.

RESPONSE: Admitted.

172. Admit that the document with Bates Number City_00011670 is a true and accurate audio-recording of a voicemail to you from Jason Kessler on March 3, 2018.

RESPONSE: Admitted.

173. Admit that the document with Bates Number City_00011671 is a true and accurate audio-

recording of a voicemail to you from Jason Kessler on March 3, 2018.

RESPONSE: Admitted.

174. Admit that the document with Bates Number City_00011722 is a true and accurate audio-recording of a voicemail to you from Jason Kessler on March 17, 2018.

RESPONSE: Admitted.

175. Admit that the document with Bates Number City_00011766 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on April 3, 2018.

RESPONSE: Admitted.

176. Admit that the document with Bates Number City_00011809 is a true and accurate audio-recording of a voicemail to you from Jason Kessler on April 22, 2018.

RESPONSE: Admitted.

177. Admit that the document with Bates Number City_00011890 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on May 30, 2018.

RESPONSE: Admitted.

178. Admit that the document with Bates Number City_00011894 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on June 1, 2018.

RESPONSE: Admitted.

179. Admit that the document with Bates Number City_00011914 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on June 7, 2018.

RESPONSE: Admitted.

180. Admit that the document with Bates Number City_00011951 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on June 29, 2018.

RESPONSE: Admitted.

181. Admit that the document with Bates Number City_00011952 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on June 30, 2018.

RESPONSE: Admitted.

182. Admit that the document with Bates Number City_00012043 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on August 12, 2018.

RESPONSE: Admitted.

183. Admit that the document with Bates Number City_00012220 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on December 2, 2018.

RESPONSE: Admitted.

184. Admit that the document with Bates Number City_00012222 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on December 4, 2018.

RESPONSE: Admitted.

185. Admit that the document beginning with Bates Number City_00019602 is a true and correct copy of the date from your Facebook account.

RESPONSE: Admitted.

186. Admit that the document with Bates Number City_00032347 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

187. Admit that the document with Bates Number City_00032348 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

188. Admit that the document with Bates Number City_00033054 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

189. Admit that the document with Bates Number City_00033055 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

190. Admit that the document with Bates Number City_00033056 is a true and accurate copy of an Instagram post you made on May 16, 2017.

RESPONSE: Admitted.

191. Admit that the document with Bates Number City_00033057 is a true and accurate copy of an Instagram message you sent on May 12, 2017.

RESPONSE: Admitted.

192. Admit that the document beginning with Bates Number City_00019602 is a true and correct copy of the date from your mobile telephone.

RESPONSE: Admitted.

193. Admit that the document with Bates Number City_00033077 is a true and accurate excerpt of an audio-recording of a telephone call between you and Samantha Bloom on March 21, 2018.

RESPONSE: Admitted.

194. Admit that the document with Bates Number City_00033081 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

195. Admit that the document with Bates Number City_00033082 is a true and accurate depiction

and representation of your car on August 12, 2017.

RESPONSE: Admitted.

196. Admit that the document with Bates Number City_00033085 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

197. Admit that the document with Bates Number City_00033098 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

198. Admit that the document with Bates Number City_00033099 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

199. Admit that the document with Bates Number City_00033100 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

200. Admit that the document with Bates Number City_00033101 is a true and accurate excerpt of an audio-recording of a telephone call between you and Samantha Bloom on December 7, 2017.

RESPONSE: Admitted.

201. Admit that the document with Bates Number City_00033102 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

202. Admit that the document with Bates Number City_00033104 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

203. Admit that the document with Bates Number City_00033105 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

204. Admit that the document with Bates Number City_00033106 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

205. Admit that the document with Bates Number City_00033107 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

206. Admit that the document with Bates Number City_00033108 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

207. Admit that the document with Bates Number City_00033109 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

208. Admit that the document with Bates Number City_00033110 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

209. Admit that the document with Bates Number City_00033112 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

210. Admit that the document with Bates Number City_00033113 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

211. Admit that the document with Bates Number City_00033114 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

212. Admit that the document with Bates Number City_00033115 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

213. Admit that the document with Bates Number City_00033116 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

214. Admit that the document with Bates Number City_00033117 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

215. Admit that the document with Bates Number City_00033118 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

216. Admit that the document with Bates Number City_00033119 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

217. Admit that the document with Bates Number City_00033120 is a true and accurate depiction

and representation of your car on August 12, 2017.

RESPONSE: Admitted.

218. Admit that the document with Bates Number City_00033121 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

219. Admit that the document with Bates Number City_00033122 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

220. Admit that the document with Bates Number City_00033123 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

221. Admit that the document with Bates Number City_00033124 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

222. Admit that the document with Bates Number City_00033125 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

223. Admit that the document with Bates Number City_00033126 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

224. Admit that the document with Bates Number City_00033127 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

225. Admit that the document with Bates Number City_00033128 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

226. Admit that the document with Bates Number City_00033129 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

227. Admit that the document with Bates Number City_00033130 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

228. Admit that the document with Bates Number City_00033131 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

229. Admit that the document with Bates Number City_00033132 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

230. Admit that the document with Bates Number City_00033133 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

231. Admit that the document with Bates Number City_00033134 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

232. Admit that the document with Bates Number City_00033135 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

233. Admit that the document with Bates Number City_00033136 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

234. Admit that the document with Bates Number City_00033137 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

235. Admit that the document with Bates Number City_00033138 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

236. Admit that the document with Bates Number City_00033139 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

237. Admit that the document with Bates Number City_00033140 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

238. Admit that the document with Bates Number City_00033141 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

239. Admit that the document with Bates Number City_00033142 is a true and accurate depiction

and representation of your car on August 12, 2017.

RESPONSE: Admitted.

240. Admit that the document with Bates Number City_00033143 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

241. Admit that the document with Bates Number City_00033144 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

242. Admit that the document with Bates Number City_00033145 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

243. Admit that the document with Bates Number City_00033146 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

244. Admit that the document with Bates Number City_00033147 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

245. Admit that the document with Bates Number City_00033148 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

246. Admit that the document with Bates Number City_00033149 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

247. Admit that the document with Bates Number City_00033150 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

248. Admit that the document with Bates Number City_00033151 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

249. Admit that the document with Bates Number City_00033152 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

250. Admit that the document with Bates Number City_00033153 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

251. Admit that the document with Bates Number City_00033154 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

252. Admit that the document with Bates Number City_00033155 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

253. Admit that the document with Bates Number City_00033156 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

254. Admit that the document with Bates Number City_00033157 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

255. Admit that the document with Bates Number City_00033158 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

256. Admit that the document with Bates Number City_00033159 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

257. Admit that the document with Bates Number City_00033160 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

258. Admit that the document with Bates Number City_00033161 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

259. Admit that the document with Bates Number City_00033162 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

260. Admit that the document with Bates Number City_00033163 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

261. Admit that the document with Bates Number City_00033164 is a true and accurate depiction

and representation of your car on August 12, 2017.

RESPONSE: Admitted.

262. Admit that the document with Bates Number City_00033165 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

263. Admit that the document with Bates Number City_00033166 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

264. Admit that the document with Bates Number City_00033167 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

265. Admit that the document with Bates Number City_00033168 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

266. Admit that the document with Bates Number City_00033170 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

267. Admit that the document with Bates Number City_00033171 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

268. Admit that the document with Bates Number City_00033172 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

269. Admit that the document with Bates Number City_00033173 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

270. Admit that the document with Bates Number City_00033177 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

271. Admit that the document with Bates Number City_00033203 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

272. Admit that the document with Bates Number City_00033214 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

273. Admit that the document with Bates Number City_00033216 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

274. Admit that the document with Bates Number City_00033218 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

275. Admit that the document with Bates Number City_00033221 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

276. Admit that the document with Bates Number City_00033226 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

277. Admit that the document with Bates Number City_00033230 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

278. Admit that the document with Bates Number City_00033231 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

279. Admit that the document with Bates Number City_00033233 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

280. Admit that the document with Bates Number City_00033237 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

281. Admit that the document with Bates Number City_00033239 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

282. Admit that the document with Bates Number City_00033244 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

283. Admit that the document with Bates Number City_00033257 is a true and accurate depiction

and representation of your car on August 12, 2017.

RESPONSE: Admitted.

284. Admit that the document with Bates Number City_00033265 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

285. Admit that the document with Bates Number City_00033267 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

286. Admit that the document with Bates Number City_00033268 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

287. Admit that the document with Bates Number City_00033270 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

288. Admit that the document with Bates Number City_00033271 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

289. Admit that the document with Bates Number City_00033272 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

290. Admit that the document with Bates Number City_00033273 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

291. Admit that the document with Bates Number City_00033274 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

292. Admit that the document with Bates Number City_00033275 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

293. Admit that the document with Bates Number City_00033276 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

294. Admit that the document with Bates Number City_00033277 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

295. Admit that the document with Bates Number City_00033278 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

296. Admit that the document with Bates Number City_00033279 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

297. Admit that the document with Bates Number 318CR1100000112 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

298. Admit that the document with Bates Number 318CR1100000134 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

299. Admit that the document with Bates Number JAS_006_1_00000032 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

300. Admit that the document with Bates Number JAS_006_1_00000066 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

301. Admit that the document with Bates Number 318CR1100000303 is a true and accurate copy of an image you posted on your Twitter account.

RESPONSE: Admitted.

302. Admit that the document with Bates Number 318cr1100000322 is a true and accurate copy of an image you posted on your Twitter account.

RESPONSE: Admitted.

303. Admit that the document with Bates Number 318cr1100000331 is a true and accurate depiction and representation of your bedside table.

RESPONSE: Admitted.

304. Admit that the document with Bates Number 318cr1100000340 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

305. Admit that the document with Bates Number 318cr1100000348 is a true and accurate

depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

306. Admit that the document with Bates Number 318cr1100000349 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

307. Admit that the document with Bates Number 318cr1100000350 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

308. Admit that the document with Bates Number 318cr1100000354 is a true and accurate copy of an image you posted on your Twitter account.

RESPONSE: Admitted.

309. Admit that the document with Bates Number 318cr1100000355 is a true and accurate copy of an image you posted on your Twitter account.

RESPONSE: Admitted.

310. Admit that the document with Bates Number 318cr1100000357 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

311. Admit that the document with Bates Number 318cr1100000358 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

312. Admit that the document with Bates Number 318cr1100000359 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

313. Admit that the document with Bates Number 318cr1100000367 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

314. Admit that the document with Bates Number 318cr1100000373 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

315. Admit that the document with Bates Number 318cr1100000384 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

316. Admit that the document with Bates Number 318cr1100000392 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

317. Admit that the document with Bates Number 318cr1100000393 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

318. Admit that the document with Bates Number 318cr1100000398 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

319. Admit that the document with Bates Number 318cr1100000402 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

320. Admit that the document with Bates Number 318cr1100000407 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

321. Admit that the document beginning with Bates Number 318cr1100000409 is a true and accurate copy of redacted data from your Instagram account.

RESPONSE: Admitted.

322. Admit that the document with Bates Number 318cr1100000414 is a true and accurate copy of an image you posted on your Twitter account.

RESPONSE: Admitted.

323. Admit that the document beginning with Bates Number 318cr1100000424 is a true and accurate copy of redacted data from your Twitter account.

RESPONSE: Admitted.

324. Admit that the document beginning with Bates Number 318cr1100000451 is a true and accurate copy of redacted data from your Twitter account.

RESPONSE: Admitted.

325. Admit that the document with Bates Number 318cr1100000657 is a true and accurate excerpt of an audio-recording of a telephone call between you and Samantha Bloom on December 7, 2017.

RESPONSE: Admitted.

326. Admit that the document with Bates Number 318cr1100000856 is a true and accurate excerpt of an audio-recording of a telephone call between you and Samantha Bloom on August 27, 2018.

RESPONSE: Admitted.

327. Admit that the document with Bates Number 318cr1100000895 is a true and accurate

depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

328. Admit that the document with Bates Number 318cr110000896 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

329. Admit that the document with Bates Number 318cr1100001038 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

330. Admit that the document with Bates Number 318cr1100001039 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

331. Admit that the document with Bates Number 318cr1100001040 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

332. Admit that the document with Bates Number 318cr1100001041 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

333. Admit that the document with Bates Number 318cr1100001042 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

334. Admit that the document with Bates Number 318cr1100001043 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

335. Admit that the document with Bates Number 318cr1100001044 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

336. Admit that the document with Bates Number 318cr1100001045 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

337. Admit that the document with Bates Number KELLY00000001 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

338. Admit that the document with Bates Number KELLY00000005 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

339. Admit that the document with Bates Number KELLY00000017 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

340. Admit that the document with Bates Number BLAIR00000930 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

341. Admit that the document with Bates Number City_00033062 is a true and accurate depiction and representation of you.

RESPONSE: Admitted.

342. Admit that the document with Bates Number City_00033073 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

343. Admit that the document with Bates Number City_00033074 is a true and accurate depiction and representation of you on August 12, 2017.

RESPONSE: Admitted.

344. Admit that the document with Bates Number City_00033280 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

345. Admit that the document with Bates Number SINES00001175 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

346. Admit that the document with Bates Number CHIA0000001 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

347. Admit that the document with Bates Number NOCUSTODIAN00000003 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

348. Admit that the document with Bates Number NOCUSTODIAN00000004 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

349. Admit that the document with Bates Number NOCUSTODIAN00000005 is a true and

accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

350. Admit that the document with Bates Number NOCUSTODIAN00044816 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

351. Admit that the document with Bates Number NOCUSTODIAN00044934 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

352. Admit that the document with Bates Number NOCUSTODIAN00044836 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

353. Admit that the document with Bates Number NOCUSTODIAN00044829 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

354. Admit that the document with Bates Number NOCUSTODIAN00044823 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

355. Admit that the document with Bates Number NOCUSTODIAN00044850 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

356. Admit that the document with Bates Number NOCUSTODIAN00044843 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

357. Admit that the document with Bates Number NOCUSTODIAN00044810 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

358. Admit that the document with Bates Number NOCUSTODIAN00044844 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

359. Admit that the document with Bates Number NOCUSTODIAN00044811 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

360. Admit that the document with Bates Number NOCUSTODIAN00044812 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

361. Admit that the document with Bates Number NOCUSTODIAN00044813 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

362. Admit that the document with Bates Number NOCUSTODIAN00044814 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

363. Admit that the document beginning with Bates Number NOCUSTODIAN00044860 is a series of photographs, each of which is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

364. Admit that the document beginning with Bates Number NOCUSTODIAN00044893 is a series of photographs, each of which is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

365. Admit that the document with Bates Number NOCUSTODIAN00044815 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

366. Admit that the document with Bates Number AERIAL00000001 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

367. Admit that you used the name Conscious Ovis Aries on your Facebook account.

RESPONSE: Admitted.

368. Admit that you used the email address jay.fields@live.com

RESPONSE: Admitted.

369. Admit that you used the email address james.fields.9279@facebook.com

RESPONSE: Admitted.

370. Admit that you used the email address Amerikan-steel@outlook.com.

RESPONSE: Admitted.

371. Admit that you used the email address dersschwarzesonne@gmail.com

RESPONSE: Admitted.

372. Admit that you lived Maumee, Ohio in August 2017.

RESPONSE: Admitted.

373. Admit that in August 2017, your cell phone number was 859-414-9660.

RESPONSE: Admitted.

374. Admit that in August 2017, Samantha Bloom's cell phone number was 859-814-1925.

RESPONSE: Admitted.

375. Admit that you used the username "TheRealGiantDad" for your Twitter account.

RESPONSE: Admitted.

376. Admit that you used the username "TheNewGiantDad" for your Twitter account.

RESPONSE: Admitted.

377. Admit that you used the username "thebigboss1337" for your Instagram account.

RESPONSE: Admitted.

Respectfully submitted,

JAMES ALEX FIELDS, JR.
By Counsel

/s/ David L. Campbell

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of August, 2020, I provided copies of the foregoing via email to the following:

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